



June 27, 2011

VIA EMAIL and U.S. MAIL

Wisconsin Dept. of Natural Resources
Attn: Andrew M. Stewart
101 S. Webster Street
P.O. Box 7921
Madison, WI 53707-7921

**Re: Comments on Permit 111003090-P21; 111003090-P26 for the Columbia
Generating Station**

Mr. Stewart:

These comments are submitted on behalf of the Sierra Club and its members. DNR's public notice for the draft permit revision states that "DNR has made a preliminary determination that the application meets state and federal air pollution control requirements..." Yet, the substance of DNR's draft permit decision is the opposite: DNR is making no determination of whether the facility meets requirements. In fact, DNR's draft permit and Preliminary Determination acknowledge that DNR is not acting on any substantive issues. Instead, DNR proposes to modify the permit shield portion of the permit to acknowledge that it has not undertaken any analysis necessary to act on certain substantive requirements. We do not see the point in, or any benefit from, this action.

Contrary to the Preliminary Determination's assertion that the draft permit revision "resolve[s] the issues related to EPA's [October 8, 2009] Order," the draft revised permit does nothing to actually address the Order. In fact, the entire apparent purpose of DNR's draft permit is to acknowledge what DNR is not doing. As the PD notes, one of the central issues in the 2009 EPA Order was a project at the Columbia plant that replaced the economizer and superheater on Unit 1 in 2006. PD at 3. Rather than "resolving" this issue, DNR expressly refuses to engage it. According to the PD, "WDNR does not believe it appropriate to pursue a separate review..." *Id.* Rather, DNR proposes to "remov[e] the permit shield for Boilers B21 and B22 until" EPA's enforcement action that addresses the same project "is resolved." *Id.* But DNR is proposing to "remove" something that never existed.

While Sierra Club agrees that there should be no permit shield for boilers B21 and B22, DNR need not take any action to achieve that result. There is no permit shield. There never has been.

The only apparent change in the draft permit revision (111003090-P26) is to add a paragraph to the permit shield section stating that the permit shield section of the permit “does not apply to, and compliance with the permit does not serve as proof of compliance with, alleged requirements that are subject of EPA’s December 14, 2009” finding of violation. *See* Draft Permit at 4. A permit shield only extends to substantive requirements which are included in the permit, or for which the agency has made an explicit determination of non-applicability in the permit. 42 U.S.C. § 7661c(f); 40 C.F.R. § 70.6(f); Wis. Stat. § 285.62(10)(b); Wis. Admin. Code § NR 407.09(5). Since no permit ever issued for the Columbia plant has ever included an explicit determination that Prevention of Significant Deterioration program requirements, New Source Review requirements and/or New Source Performance Standard requirements were inapplicable, there has never been a permit shield for those provisions. It is not necessary to also explicitly state that there is no permit shield.

We also note that DNR has not complied with the EPA’s 2009 Order and has not complied with the minimum requirements of the Clean Air Act or Wis. Stat. ch. 285 for issuing an operating permit. DNR does not address the requirements explicitly required of it in EPA’s Order. DNR has also never actually determined compliance with relevant standards, has not included a compliance schedule, has not included all applicable requirements, and has not addressed the substance of EPA’s Order. As DNR is aware, Sierra Club is seeking a court order requiring the EPA to revoke or revise the Columbia operating permit because Wisconsin DNR has failed to timely and substantively respond to the 2009 EPA Order. Nothing in the DNR’s proposed action at issue here affects that. Not only is DNR’s action over a year too late, but it explicitly and purposefully avoids addressing the substance of EPA’s Order. EPA remains responsible for correcting or withdrawing the permit in light of DNR’s failures.

Sincerely,

MCGILLIVRAY WESTERBERG & BENDER LLC



David Bender

cc (via email):

Cheryl Newton
U.S. EPA Region 5

Terry Branigan
U.S. EPA Region 5

Todd Palmer
Michael Best & Friedrich

Mark Thimke
Brian Potts
Foley & Lardner

Dan Siegfried
Michael Greiveldinger
Alliant Energy



Wisconsin Power and Light Co.
An Alliant Energy Company

Corporate Headquarters
4902 North Biltmore Lane
Suite 1000
Madison, WI 53718-2148

1-800-ALLIANT (255-4268)
www.alliantenergy.com

Mr. Andrew M. Stewart
Bureau of Air Management
Wisconsin Department of Natural Resources
101 South Webster Street
Post Office Box 7921
Madison, WI 53707-7921

Re: Proposed Significant Revision of the Operation Permit for
the Columbia Energy Center – Permit No. 111003090-P26

Dear Mr. Stewart:

This letter is in response to the Department's proposed Significant Revision of the Operation Permit for the Columbia Energy Center ("CEC"), Permit No. 111003090-P26. Wisconsin Power and Light Company ("WPL") and the co-owners of CEC appreciate the Department's continuing effort to resolve the outstanding Title V issues relating to CEC. We understand, given the multiple parties and issues involved, this can be a time consuming and complex task. While we do not agree with the Department's approach as reflected in proposed Permit No. 111003090-P26, we do appreciate the time and effort devoted to this matter.

I. General Comment – Department's 05-RAF-292 Decision is Correct

As WPL previously communicated to the Department in meetings and in the detailed comments submitted in response to proposed Permit No. 111003090-P23 (relevant portions of which are attached and incorporated herein), the decision made by WDNR in 2005 and memorialized in 05-RAF-292 is both legally and technically correct. The Department acknowledged that position in the documents supporting proposed Permit No. 111003090-P23. In fact, the Department, after conducting a re-evaluation of 05-RAF-292 in the context of proposed Permit No. 111003090-P23, reconfirmed its position. Given that, WPL sees no basis for the proposed changes to the Title V permit.

At a minimum, if the Department decides to finalize the proposed revisions in Permit No. 111003090-P26, WPL urges the Department to reaffirm its prior determination in 05-RAF-292 in this permit record (e.g., in the response to comments).

II. Specific Comments

In addition to WPL's position that 05-RAF-292 is correct, the following sets forth specific comments on the proposed revision (No. 111003090-P26) to the CEC operating permit. In summary, it is our position that:

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- (1) the proposed revision is overbroad because it includes both Unit 1 (B21) and Unit 2 (B22) when the Department's decision in 05-RAF-292 (which is the subject of EPA's objection) only relates to Unit 1 (B21).
- (2) the Department's proposed revision is contrary to Wis. Admin. Code § NR 407.14;
- (3) no rational basis is provided in the Department's preliminary determination for proposed Permit No. 111003090-P26 that supports the Department's proposed significant revision to CEC's Title V permit; and
- (4) the proposed revision of CEC's Title V permit is logically inconsistent with other portions of the existing permit not subject to the proposed revision.

III. The Proposed Permit Shield Revision is Overbroad

The permit shield revision in proposed Permit No. 111003090-P26 is overbroad and includes both Unit 1 (B21) and Unit 2 (B22). The core issue behind the proposed revision is the Department's decision in 05-RAF-292, which only addresses Unit 1 (B21). No rationale is provided for including Unit 2 (B22) within the scope of the proposed revision. While it is WPL's position that the proposed revision is unlawful for the reasons stated below, at a minimum, the proposed revision should only address Unit 1 (B21).

IV. The Proposed Revision is Contrary to Wis. Admin. Code § NR 407.14

The Department's authority to reopen and revise a Title V permit is circumscribed by the provisions of NR 407.14. Under NR 407.14, revisions to a Title V are divided into mandatory action (where the Department must reopen the Title V permit) and discretionary action (where reopening of the operating permit is allowed but not required). Mandatory revisions under NR 407.14(1) are necessarily limited to those dealing with applicable requirements, changes to applicable emissions limits or ambient standards that require emission reductions or where a material mistake exists. Wis. Admin. Code §§ NR 407.14(1). None of these mandatory revision provisions apply to the proposed revision of the permit shield provisions put forward by the Department. The proposed revision does not address new or changed applicable requirements, compliance with an applicable requirement nor a change in an air emission limit or air quality standard. Further, as the Department acknowledges that 05-RAF-292 was correctly decided, there is no material mistake being addressed. Rather, the proposed revision only addresses limited aspects of the permit shield provisions. Thus, under NR 407.14(1), WDNR is not mandated by Wisconsin law to reopen the permit and cannot rely on NR 407.14(1) as legal authority for its action.

Discretionary revisions are allowed under NR 407.14(1m), but again, the circumstances are limited and relate to (i) a significant or reoccurring violation, (ii) a misrepresentation or failure to disclose, (iii) reconstruction or replacement or modification not requiring a construction permit, (iv) typographical error or (v) a change to NR 445. None of

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these apply to the proposed revision. No violations occurred, and none are specified by the Department (rather the Department acknowledged its permitting determination was and is correct). No misrepresentation occurred. There are no permit typographical errors, and no changes to NR 445 are involved. A modification, as defined under NR 400.02(99), occurred, but the Department affirmatively determined before the fact in 05-RAF-292 (and as reaffirmed) that no Title I permit was required for that modification nor was a revision to the Title V permit necessary. In addition, the modification covered by 05-RAF-292 occurred during the term of CEC's prior Title V permit, not the current CEC operating permit. Any action or revision of a Title V relating to 05-RAF-292, if appropriate or necessary (which it was/is not), should have occurred during either the term of Permit No. 111003090-P10 or when Permit No. 111003080-P21 was issued in 2009 and not through a revision effort in 2011, six years "after the fact."

Lacking a legal basis under NR 407.14 or a request for revision from the permittee (CEC) under NR 407.13, the proposed action to significantly revise the CEC Title V permit does not comply with Wisconsin law.

V. No Rational Basis is Provided for the Department's Proposed Action

A fundamental tenet of Wisconsin administrative law is that an agency decision must have a rational basis. *Harnischfeger Corp. v. Laborer & Industry Review Comm'n*, 196 Wis. 2d 650 (1995); *PRN Associates, LLC v. Dep't of Administration*, 756 N.W.2d 580 (Wis. Ct. App. 2008); see Wis. Stat. § 227.57(8). Lacking a rational basis, an agency action is considered "arbitrary or unreasonable." *Glacier State Distrib. Servs, Inc. v. DOT*, 221 Wis. 2d 359 (Wis. Ct. App. 1998). Thus, there needs to be a clear explanation that logically supports a proposed agency action in order to satisfy the "rational basis" test.

Here, the Department, in the preliminary determination supporting the proposed revision to CEC's operating permit (Permit No. 111003090-P26), cites several reasons for its proposed action, none of which are rationally related or provide any support to the proposed changes made to the permit shield language in the CEC operating permit. For example, the Department notes that U.S. EPA issued a notice of violation to CEC. While correct, a notice of violation is just that – a notice. It is not a judicial or administrative determination or finding. It is not even a formal allegation in a lawsuit. As determined by several United States Courts of Appeals, a notice of violation provides no basis for changing or revising a Title V permit. See *Citizens Against Ruining the Env't v. Env't Protection Agency*, 535 F.3d 670 (7th Cir. 2008); *Sierra Club v. U.S. Env't'l Protection Agency*, 557 F.3d 401 (11th Cir. 2009). Thus, the issuance of a notice of violation by another agency provides no rational basis for the Department to revise the permit shield provision. This is especially the case in a situation where the Department expressly determined in a prior permitting decision, which it subsequently reaffirmed (05-RAF-292), that the action raised in the notice of violation was conducted in a legally correct manner.

Further, the Department's proposed revision of CEC's Title V permit is inconsistent and at odds with the Department's prior and existing practice and procedure. U.S. EPA issues numerous notices of violation to facilities in Wisconsin with Title V permits. The list can be readily determined by viewing U.S. EPA-Region 5's enforcement webpage as well as

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from the Department's own records. In these other situations, the Department's practice and procedure is not to reopen the notice of violation recipients' Title V permits to revise the permit shield language. Yet here the Department proposes to deviate from its long standing practice and procedure. Such action is contrary to the rational basis doctrine of Wisconsin administrative law and is considered arbitrary and capricious.

The Department further references a U.S. EPA/WDNR enforcement memorandum as another reason for the proposed revision to the permit shield provision of CEC's operating permit. However, nothing in the enforcement memorandum addresses or refers to the Department reopening the permit shield provisions of Title V permits. And, even if it did, the enforcement memorandum is not a law, rule or regulation. It is merely a procedural memorandum that, on its face, makes the statement that it creates no legal rights or remedies. Thus, no rational connection exists between the proposal to reopen CEC's Title V permit shield provisions and an intergovernmental procedural memorandum.

Finally, the Department refers to an internal agency program-wide policy being developed and implemented with respect to responding to public comments that are filed by interested parties in air permit proceedings. How an internal policy on responding to public comments relates to the reopening of CEC's operating permit to modify the permit shield provisions is not explained. What the Department does in addressing public comments on a "program-wide" basis has no logical relationship to CEC's Title V permit and provides no rational basis for the Department's action, as set forth in proposed Permit No. 111003090-P26, to reopen and revise CEC's operating permit.

Thus, none of the Department's bases for its action provide any support for reopening CEC's operating permit or revising the operating permit's permit shield provisions. Without a rational nexus between the Department's reason for acting and the action itself (revision of the permit shield language), the proposed revision necessarily is considered arbitrary and unreasonable under Wisconsin administrative law.

VI. Proposed Permit Revision is Logically Inconsistent With Other Permit Provisions

The proposed revisions to the permit shield provisions set forth in Permit No. 111003090-P26 are logically inconsistent with other provisions of the current permit not being revised. Permit No. 111003090-P26 expressly carries over the language below from the current permit:

The following permit orders etc. are adopted under s. 285.65(3) and NR 407.09(2)(d), Wis. Adm. Code by Permit 111003090-P26 which then becomes the primary enforceable document.

Permit/Order Number	Issuance Date	Sources Covered & Description	Permit Adopted – Status
05-RAF-292	October 12, 2005	Exemption	None – Active

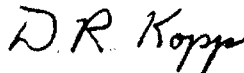
Mr. Andrew M. Stewart
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Since 05-RAF-292 is expressly incorporated into and made enforceable through CEC's operating permit, it is logically inconsistent in proposed Permit No. 111003090-P26 to propose to then remove 05-RAF-292 from permit shield coverage. No explanation or rationale is provided addressing this inconsistency, which again demonstrates the lack of a rational basis for the proposed permitting action.

VII. Conclusion

As noted in the opening to this comment letter, we appreciate the efforts of the Department in addressing the issues raised in the CEC matter. However, as stated in this and other permit proceedings, the Department should continue to stand behind its decision in 05-RAF-292.

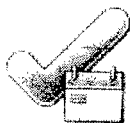
Very truly yours,



Douglas R. Kopp
Chief Environmental officer

Enclosures

cc: Jerald Lokenvitz, CEC Plant Manager
Jeff Jaeckels, MGE
Randy Oswald, WPSC



Progress Update on Title V Revisions Responding to EPA Orders

Tue 07/12/2011 1:00 PM - 2:00

PM

Attendance is **required** for Susan Kraj

Chair: **Andrew.Stewart@Wisconsin.gov**

Location: 713

Required:

Mary.Oleson@wisconsin.gov, Sonny.Zentner@Wisconsin.gov,
Carol.Crawford@Wisconsin.gov, Bradford.Pyle@Wisconsin.gov,
Renee.Bashel@Wisconsin.gov, Susan Kraj/R5/USEPA/US, Barbara.Pavlisca@Wisconsin.gov

Description

When: Tuesday, July 12, 2011 1:00 PM-2:00 PM (GMT-06:00) Central Time (US & Canada).
Where: 713

Note: The GMT offset above does not reflect daylight saving time adjustments.

~~*~*~*~*~*~*~*~*

Call in number for EPA
608.266.2859

Join the meeting.<

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Location: https://www.livemeeting.com/cc/widnr_secondary

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RE: next Title V petition call

Bashel, Renee L - DNR to: Susan Kraj
Cc: Danny Marcus

08/03/2011 07:55 AM

From: "Bashel, Renee L - DNR" <Renee.Bashel@Wisconsin.gov>
To: Susan Kraj/R5/USEPA/US@EPA
Cc: Danny Marcus/R5/USEPA/US@EPA

History: This message has been replied to.

Thanks! Instead of working through lunch, although most probably do anyway, I took your earlier suggestion. We'll go with 9:30-10:30.

Renee

-----Original Message-----

From: Susan Kraj [mailto:Kraj.Susan@epamail.epa.gov]
Sent: Tuesday, August 02, 2011 3:53 PM
To: Bashel, Renee L - DNR
Cc: Danny Marcus
Subject: Re: next Title V petition call

We could do 11:30 am. (Or if that doesn't work 9:30 am.)
Thanks.

From: "Bashel, Renee L - DNR" <Renee.Bashel@Wisconsin.gov>
To: Susan Kraj/R5/USEPA/US@EPA, Danny Marcus/R5/USEPA/US@EPA
Date: 08/02/2011 03:05 PM
Subject: next Title V petition call

Hi

Would 11 am on Tues, Aug 16th work? Andy has something already scheduled in the afternoon.

Thanks
Renee



RE: Notes from Last Week's Update Discussion regarding Orders /Petitions
Pavliscaak, Barbara N - DNR to: Susan Kraj, Danny Marcus

09/06/2011 10:56 AM

From: "Pavliscaak, Barbara N - DNR" <Barbara.Pavliscaak@Wisconsin.gov>
To: Susan Kraj/R5/USEPA/US@EPA, Danny Marcus/R5/USEPA/US@EPA

Call in Number 608-264-8871 (conf. room 703)

From: Pavliscaak, Barbara N - DNR
Sent: Friday, September 02, 2011 02:23 PM
To: 'Kraj.Susan@epamail.epa.gov'; 'Danny Marcus - EPA'
Subject: Notes from Last Week's Update Discussion regarding Orders/Petitions

When: Tuesday, August 30, 9:30.

Where: Susan and Danny called Barb at here desk

Updates:
Weston –

Edgewater –

Pulliam –

Oak Creek -

Columbia - Andy had said he would talk with managers and see if they wanted to move forward
Meeting has not yet been set up. No newer info at this time.

Next Conference Call - Tuesday, September 6 at 3:30 p.m.
EPA Region V will be provided a number to call earlier that day.



Title V Petition Update Conference Call with EPA Region V and Wisconsin

Wed 10/05/2011 10:00 AM - 11:00 AM

Attendance is **required** for Susan Kraj
Chair: **Barbara.Pavliscak@Wisconsin.gov**
Location: Live Meeting, from Rm 713

Required: Andrew.Stewart@Wisconsin.gov, Carol.Crawford@Wisconsin.gov,
Sonny.Zentner@Wisconsin.gov, Renee.Bashel@Wisconsin.gov, Susan Kraj/R5/USEPA/US,
Danny Marcus/R5/USEPA/US

Description

When: Wednesday, October 05, 2011 10:00 AM-11:00 AM (GMT-06:00) Central Time (US & Canada).
Where: Live Meeting, from Rm 713

Note: The GMT offset above does not reflect daylight saving time adjustments.

Title V Petition Update Conference Call with EPA Region V and Wisconsin
Tuesday, October 5 at 10:00 pm, Rm. 713

WDNR participants, click here to join: Join the meeting
EPA Region V, call this number: 608-266-2859

Questions? Call Barb Pavliscak, 608-267-7540

Updates from Last Conf. Call (9/6/2011):
Weston -

Edgewater -

Pulliam -

Oak Creek -

Columbia - Andy is to meet with Marney, Pat Stevens and Kendra Fisher on Monday, Sept 12, to discuss

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 CR>

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Personal Notes



Title V Petition Update Conference Call with EPA Region V and Wisconsin

Tue 10/18/2011 9:00 AM - 10:00 AM

Attendance is **required** for Susan Kraj

Chair: **Barbara.Pavliscak@Wisconsin.gov**

Location: Live Meeting out of Rm 713, and via 608-266-2859 for EPA

Required:

Andrew.Stewart@Wisconsin.gov, Renee.Bashel@Wisconsin.gov,
Carol.Crawford@Wisconsin.gov, Sonny.Zentner@Wisconsin.gov, Susan Kraj/R5/USEPA/US,
Danny Marcus/R5/USEPA/US

Description

When: Tuesday, October 18, 2011 9:00 AM-10:00 AM (GMT-06:00) Central Time (US & Canada).
Where: Live Meeting out of Rm 713, and via 608-266-2859 for EPA

Note: The GMT offset above does not reflect daylight saving time adjustments.

Title V Petition Update Conference Call with EPA Region V and Wisconsin
Tuesday, October 18, 9:00 am - 10:00 am, Rm 713

EPA Region V, call this number: 608-266-2859

Wisconsin participants: click on the Join link toward the bottom of this email

Updates from last call (Oct 5):
Weston •

Pulliam

Edgewater

Oak Creek

Columbia

Andy: had heard that settlement on enforcement was close; but no, so Andy will be continuing. Has been through public comment. Andy thinks it won't be too hard to come up with a recommendation to management, respond to comments, and then issue it. But legal council has been changing, which causes hold-ups. Facility has submitted an adverse comment that claims WDNR that doesn't have the authority to do this, but 407.14 allows us to do a Mandatory Revision. Furthermore, Part 70 f & g also allows authority for EPA to revise a permit pursuant to an order.
Timeframe - Andy will be trying to schedule meeting with managers and legal.

Murphy Oil -

-+-----+-----+-----+-----+-----+-----+-----+-----+

Barb Pavliscak has invited you to attend an online meeting using Microsoft® Office Live Meeting service.

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Meeting ID: NNRMT9
Entry Code: s95%Cp&4j
Location: https://www.livemeeting.com/cc/widnr_secondary

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Updated: Title V Petition Update Conference Call with EPA Region V and Wisconsin, and Discussion of Lindem's Petition Issue Proposal Calendar Entry

Thu 11/03/2011 9:00 AM - 10:00 AM

Attendance is **required** for Susan Kraj

Chair: Danny Marcus/R5/USEPA/US

Room: R1819/R5 Metcalfe - 18th Floor@EPA

Required:	Susan Kraj/R5/USEPA/US@EPA
Optional:	Genevieve Damico/R5/USEPA/US@EPA

Description



Updated: Title V Petition Update Conference Call with EPA Region V and Wisconsin, and Discussion of Lindem's Petition Issue Proposal

Thu 11/03/2011 9:00 AM - 11:00 AM

Attendance is **required** for Danny Marcus

Chair: Barbara.Pavlisack@Wisconsin.gov

Location: Live Meeting

Required:	Andrew.Stewart@Wisconsin.gov, Renee.Bashel@Wisconsin.gov, Joseph.Brehm@Wisconsin.gov, Mary.Oleson@wisconsin.gov, Sonny.Zentner@Wisconsin.gov, Carol.Crawford@Wisconsin.gov, Susan Kraj/R5/USEPA/US, Danny Marcus/R5/USEPA/US, Susan.Lindem@wisconsin.gov
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Description

When: Thursday, November 03, 2011 9:00 AM-11:00 AM (GMT-06:00) Central Time (US & Canada).

Where: Live Meeting

Note: The GMT offset above does not reflect daylight saving time adjustments.

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We are going to extend this LiveMeeting until 11:00 because Sue Lindem would like input from the permit writers dealing with petitioned permits on the issues of including/removing old limits from permits and including application information in permits, to help her frame a proposal for the Title V Petition workgroup meeting on November 8th. Barb

-+-----+-----+-----+-----+-----+-----+-----+-----+-----+

Barb Pavliscak has invited you to attend an online meeting using Microsoft® Office Live Meeting service.

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Meeting ID: 99RC6K
Entry Code: 2M-PBW'xN
Location: https://www.livemeeting.com/cc/widnr_secondary

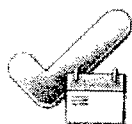
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Title V Petition Update Conference Call with EPA Region V and Wisconsin

Fri 11/18/2011 10:00 AM - 11:00 AM

Attendance is **required** for Susan Kraj

Chair: **Barbara.Pavliscak@Wisconsin.gov**

Location: Live Meeting, initiated from Conf Rm 713, GEF II, Madison

Required: Andrew.Stewart@Wisconsin.gov, Renee.Bashel@Wisconsin.gov,
Mary.Oleson@wisconsin.gov, Sonny.Zentner@Wisconsin.gov,
Carol.Crawford@Wisconsin.gov, Susan Kraj/R5/USEPA/US, Danny Marcus/R5/USEPA/US

Description

When: Friday, November 18, 2011 10:00 AM-11:00 AM (GMT-06:00) Central Time (US & Canada).
Where: Live Meeting, initiated from Conf Rm 713, GEF II, Madison

Note: The GMT offset above does not reflect daylight saving time adjustments.

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Friday 18, 10:00 - 11:00 am, Rm 713

EPA Region V, call this: 608-266-2859

Wisconsin participants: click on the Join link (toward bottom of email)

Updates from last call (Nov 3):

Weston:

Pulliam:

Edgewater:

Oak Creek:

Columbia:

Andy: No progress at this time. None of the aforementioned discussion have taken place

Susan: EPA has been have discussions on this one.

Andy: OK. Will try to meet with Pat Stevens to get direction soon. Will let Susan know ASAP.

Calumet (f.k.a. Murphy Oil) -

-+-----+-----+-----+-----+-----+-----+-----+-----+-----+

Barb Pavliscak has invited you to attend an online meeting using Microsoft® Office Live Meeting service.

Join the meeting<

[https://www.livemeeting.com/cc/widnr_secondary/join?id=CMBTP4&role=attend&pw=Nx\(5%225tBW>](https://www.livemeeting.com/cc/widnr_secondary/join?id=CMBTP4&role=attend&pw=Nx(5%225tBW>)

AUDIO INFORMATION

Computer Audio

To use computer audio, you need speakers and a microphone, or a headset.

FIRST-TIME USERS

To save time before the meeting, check your system<<http://go.microsoft.com/fwlink/?LinkId=90703>> to make sure it is ready to use Office Live Meeting.

TROUBLESHOOTING

Unable to join the meeting? Follow these steps:

1. Copy this address and paste into your web browser:
https://www.livemeeting.com/cc/widnr_secondary/join
2. Copy and paste the required information:
Meeting ID: CMBTP4
Entry Code: Nx(5"5tBW
Location: https://www.livemeeting.com/cc/widnr_secondary

If you still cannot enter the meeting, contact support.<

http://r.office.microsoft.com/r/rldLiveMeeting?p1=12&p2=en_US&p3=LMInfo&p4=support>

NOTICE

Office Live Meeting can be used to record meetings. By participating in this meeting, you agree that your communications may be monitored or recorded at any time during the meeting.